

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 23-CR-80182 --ROSENBERG/REINHART**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID SHTEINBERG,

Defendant(s).

/

**DEFENDANT SHTEINBERG'S UNOPPOSED/AGREED MOTION TO CONTINUE THE
TRIAL DATE AND TO EXTEND THE TIME FOR FILING PRETRIAL MOTIONS**

Mr. SHTEINBERG, by and through undersigned counsel, hereby moves this Court to continue the trial date and to extend the time for filing of pretrial motions, and as grounds therefore states as follows:

1. Mr. SHTEINBERG is charged under Counts 1 and 11 of the indictment.
2. Calendar call is currently scheduled for December 13, 2023.
3. Undersigned counsel received a large amount of electronically-stored discovery approximately two days prior to the date of this motion.
4. Undersigned counsel needs additional time in order to review that discovery and to discuss it with Mr. SHTEINBERG. Undersigned will therefore not have sufficient time to do those things prior to calendar call.
5. Therefore, Mr. SHTEINBERG, through undersigned counsel, is requesting that the Court continue the trial date in this case for sixty days.
6. Mr. SHTEINBERG is also requesting that the Court extend the deadline for filing

pretrial motions.

7. Undersigned counsel contacted opposing counsel, Assistant U.S. Attorney Brian Ralston, who stated that the government does not object to the Court granting this motion.

WHEREFORE, Mr. SHTEINBERG, through undersigned counsel, requests that the Court grant this agreed motion.

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Attorney for Defendant DAVID SHTEINBERG

CERTIFICATE OF SERVICE

Undersigned counsel certifies that on November 30, 2023 this agreed motion was electronically filed with the Clerk of Court using CM/ECF, and it was electronically transmitted to all counsel of record.

/S/ Brian Balaguera
BRIAN BALAGUERA, Esq.
Fla. Bar. No. 0025702

Attorney for Defendant DAVID SHTEINBERG

